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Subject: FRAC Comments on 2007 Farm Bill
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December 29, 2005

The Honorable Mike Johanns
Secretary

United States Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250-3355

Via mail, e-mail and internet: [_http://www.usda.gov/_](http://www.usda.gov/)
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Dear Secretary Johanns:

We appreciate your invitation for public comment on priorities for the 2007

Farm Bill. We also are pleased that you and Under Secretary for Food, Nutrition and Consumer Services Eric Bost have conducted Farm Bill Forums across the country.

We will be in contact with the Department throughout 2006 and 2007 regarding

food stamp priorities in the Farm Bill. This letter summarizes the key points we believe should receive early and continuous attention.

Our top priority for the 2007 Farm Bill is a strong nutrition title that

reauthorizes and improves the Food Stamp Program. We believe that the 2002

Farm Bill made important progress upon which to build. With leadership from

President Bush, USDA and key members of Congress, that bill restored food stamp

eligibility for many legal immigrants. In addition, the bill maintained the

program's entitlement structure; improved access for low-income working

families; modestly increased allotment levels; reformed how USDA evaluates state

administration of the program; and gave states new options to streamline

enrollment and reporting, aiding both clients and caseworkers.

Nonetheless, as the department's own research conducted with the Census

Bureau reveals, we have far to go in addressing hunger and food insecurity in

this nation. More than 38.2 million Americans live in households experiencing

food insecurity. Our nation must make greater public investments in the

nutrition programs to address that problem.

The Food Stamp Program can do much to eradicate hunger and food insecurity

in the U.S. To realize its potential, however, our nation must make benefit

allotments adequate, open eligibility to more needy people, and connect more

eligible people with benefits.

As a threshold matter, we urge the 2007 Farm Bill to maintain the entitlement structure of the Food Stamp Program, which responds to

increases in need whether due to economic changes or disasters. One recent example underscores this point. We applaud the role that the Food Stamp Program played as an effective "responder" in the wake of recent hurricanes. A number of factors contributed to that response: strong leadership from you and your team at USDA; key efforts of state governments; the efficiency of the Electronic Benefit Transfer (EBT) delivery system; and outreach and advocacy by non-profit

partners. But the foremost factor underpinning the Food Stamp Program's ability to act as an effective post-Katrina "responder" was and is its entitlement structure that lets it respond quickly and flexibly to changes in need.

We urge the 2007 Farm Bill to make benefit allotments adequate by increasing the minimum benefit and other allotment levels. It is the norm rather than the exception for a food stamp recipient household's benefits to run out several days or more before the end of the month. The Thrifty Food Plan does not represent what a family needs to purchase a minimally adequate diet, particularly for long-term consumption. Food stamp benefits should be based on a food plan that reflects what it actually costs to feed a family a healthy diet. Moreover, the \$10 minimum benefit is woefully inadequate. More than four years ago we supported bipartisan legislation offered by Senators Arlen Specter (R-PA) and Edward M. Kennedy (D-MA) that would have increased the minimum benefit to \$25. A significant increase in the minimum benefit is long overdue.

We urge that the 2007 Farm Bill expand eligibility to more needy people left out of the program now. These include all otherwise eligible legal immigrants, able-bodied adults who now face arbitrary time limits, ex-drug felons making new starts, and others struggling to make ends meet. We urge the 2007 Farm Bill to revise resource rules so that families need not forfeit the opportunity to save in order to participate in the Food Stamp Program. Current resource limits are too restrictive (\$3,000 for households with an elderly or disabled member; \$2,000 for other households). Allowing families that suffer unemployment, involuntary part-time work, illness or other financial emergencies to access food stamp benefits without exhausting their resources will help those families rebound and promote their

self-sufficiency long-term, and will further the Administration's commitment to an Ownership Society.

For many eligible people, the process of enrolling and recertifying in the Food Stamp Program is much too complicated and time-consuming, and all too often demeaning. We applaud changes made in the 2002 Farm Bill to give states options to streamline reporting and ease the transition for those leaving cash welfare to the Food Stamp Program. We urge the 2007 Farm Bill to further simplify the program for clients and caseworkers. Good customer service and accurate benefit processing are undermined by

inadequate investments in caseworker staffing and office systems. The problems states have in funding these operations were exacerbated in the last decade, as the federal government discontinued an enhanced federal match rate for state computer expenses and adopted a cost allocation formula below the

traditional 50/50 match rate. We understand that, on average, states now put up 54 cents of each administrative dollar, the federal government only 46 cents. We

urge the Department in its 2007 Farm Bill recommendations to increase reimbursements (match rates) for state administrative operations. We urge that the 2007 Farm Bill also earmark more funding for food stamp

outreach and education activities. As you know, the department estimates that just over half (56 percent) of those eligible under current rules are participating in the program. USDA's "Food Stamps Make America Stronger" media campaign and grants to fund community-based outreach efforts are important initiatives, and a sound start. Considerably more funding for these and other efforts will be important to connect more eligible people with benefits.

We urge that the 2007 Farm Bill continue to allow recipients choice among food purchases and support healthy choices through nutrition education. The

current clear distinction between food and non-food items is in keeping with the fundamental purposes of the program and provides consumers and retailers with a simple test for determining an eligible product.

Differentiating among food products introduces complexity, stigma and confusion as to the program's purposes. And recent research underscores that participation in the Food

Stamp Program is a useful strategy in the fight against obesity. The peer-reviewed study, by academic researchers at the University of North Carolina,

Chapel Hill, and the University of Tennessee, Knoxville, reports that girls in food insecure households had a significantly lower risk of being overweight if they participated in any or all of three programs, including School Lunch, School Breakfast, and Food Stamps. Much of the stigma that had attached to the Food Stamp Program in the past stemmed from the public nature of redeeming food stamp coupons (the physical scrip that was used) in a supermarket line, as well as from the program's connection with the welfare system. The implementation of EBT technology has helped to mainstream and make virtually invisible the food stamp purchase transaction at point of sale. And EBT interoperability has made this transaction work for customers and retailers across state borders. Conversely, treating recipient shoppers differently from other consumers would threaten to increase stigma and run counter to national and state efforts to empower people as they move to self-sufficiency. Food Stamp Nutrition Education is an important component in a multi-faceted approach to ensuring good nutrition outcomes. Other complements include

providing people with adequate resources to purchase food; ensuring appropriate outlets for obtaining fruits and vegetables; promoting afterschool and summer programs that offer safe recreational activities; and altering environmental messages that affect individuals' behavior. We urge that the 2007 Farm Bill continue EBT delivery. As noted above, we believe that EBT delivery has helped to decrease stigma and increase public confidence in the integrity of the program.

We urge renaming the program in the 2007 Farm Bill or before to reflect recent modernization and reforms.

The 2007 Farm Bill should include new investments in the Food Stamp Program to make real progress in eradicating hunger and food insecurity in the U.S.

The increased dollars would pay dividends in good child development, child health, school achievement, a more productive work force, and greater economic security for America's rural, urban and suburban families.

We appreciate this opportunity to share our views on the 2007 Farm Bill and look forward to continued work with you and the department as the process moves forward.

Sincerely,

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